

# PHILIPS POSITION

- ALTO® products world wide adherence to California's TTLC
- Goal of ALTO specification is to reduce mercury from Salina, Kansas to Bangpoo, Thailand
- ALTO linear fluorescents means California Compliance-TCLP, STLC, TTLC, Aquatic Bioassay

# PHILIPS POSITION

- Ninety five percent conversion
- Additional ALTO types being developed
- Eco-Vision and Eco-Design programs
- Philips encourages distributors to partner with recyclers

# CURRENT CALIFORNIA

- Regulations **require** recycling of all hazardous lamps
- National average recycling rate is approx.. 24%, California about the same
- Enforcement of current regulations would significantly increase recycling

# CURRENT CALIFORNIA

- Recyclers located in Hayward, Ontario and Phoenix serve the California market
- Philips has encouraged recycling of its products for many years

*Let's make things better.*



**PHILIPS**

# TTLC 20 PPM

- Current mercury levels from PHILIPS and other manufacturers demonstrate the possibility of producing non-hazardous lamps
- Other manufacturers have incentive to lower mercury levels to save market share
- Source reduction should be a goal of regulation

# TTLC 20 PPM

- Mercury level in products should be looked at from a Public Policy standpoint as well as a risk based standpoint
- Risk based numbers are “soft” and contain assumptions which can skew the conclusion
- Public policy, like regulatory goals should encourage source reduction not stifle it

# TTLC 20 PPM

- Distinction between hazardous and non-hazardous is important
- Recycling non-hazardous lamps under current regulations reduces costs of storage, training and handling for end users
- TTLC is a more stringent test which can not be influenced by additives like the TCLP test

# TTLC 20 PPM

- The future of mercury source reduction and increased recycling is up to DTSC and Legislature
- Phasing down may be a possibility
- Research is ongoing

# TTLC 20 PPM

California hazardous waste regulation are the toughest in the nation and are a model for other jurisdictions considering this question